

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Jemima Sanchez,

Plaintiff,

v.

Illinois Department of Employment Security,

Defendant.

No. 23 C 5791

Judge Georgia N. Alexakis

INITIAL JOINT STATUS REPORT FOR REASSIGNED CASE

Plaintiff, Jemima Sanchez (“Plaintiff”), *pro se*, and Defendant, Illinois Department of Employment Security (“Defendant”), by and through its attorney, Kwame Raoul, Attorney General of Illinois, and pursuant to the Court’s May 6, 2024, Order, ECF No. 31, submit the following joint status report.

I. Nature of the Case

A. Attorneys of record for each party.

Plaintiff Jemima Sanchez
Pro se
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Plaintiff

Kamil Z. Merchant
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Counsel for Defendant

B. Basis for federal jurisdiction.

Jurisdiction is proper under 28 USC §§ 1331 and 1343.

C. Briefly describe the nature of the claims asserted in the complaint and the counterclaims and/or third-party claims and/or affirmative defenses.

Plaintiff brings a claim under the American Disabilities Act of 1990 (“ADA”), 42 U.S.C. § 12101, *et seq.*, alleging discrimination and retaliation, and a claim under the Family and Medical Leave Act (“FMLA”) 29 U.S.C. § 2611, *et seq.*, alleging violations of the FMLA. Defendant has raised the following affirmative defenses: (1) Plaintiff’s ADA claim is untimely to the extent that the actions or inactions of Defendant as alleged by Plaintiff did not occur within 300 days of the filing of her charge of discrimination with the Equal Employment Opportunity Commission; and (2) Plaintiff’s ADA claim is barred for failure to exhaust administrative remedies.

D. Describe the relief sought by the plaintiff(s) and provide an estimate of damages, if any.

Plaintiff seeks back pay, compensatory and consequential damages, punitive damages, and costs and attorneys’ fees. She does not yet have an estimate of her damages.

E. List the names of any parties who have not yet been served.

Plaintiff has served Defendant.

II. Discovery and Pending Motions

A. Briefly describe all pending motions, including the date the motion was filed and the briefing schedule, if any.

There are no pending motions.

B. What is the current discovery schedule?

Fact discovery is set to close on May 2, 2025, with expert discovery to close by August 1, 2025. ECF No. 31.

C. Briefly describe all fact and expert discovery that the parties have conducted, including any electronic discovery. Describe any discovery that the parties still need to complete, and indicate whether the parties anticipate completing discovery by the current deadline.

Defendant has made its Rule 26(a)(1) disclosures, and no other discovery has been conducted in this matter at this time. The parties anticipate being able to complete discovery by May 2, 2025.

D. Briefly summarize all substantive rulings issued in the case. (For each ruling, include the date and the docket number.)

On August 21, 2023, this matter was removed from the Circuit Court of Cook County, Illinois. On August 31, 2023, Defendant filed a motion to dismiss Plaintiff's first amended complaint, which the Court granted without prejudice on December 5, 2023. Plaintiff filed her second amended complaint on January 5, 2024.

E. Briefly describe any anticipated motions, including whether any party intends to move for summary judgment.

Defendant anticipates moving for summary judgment on all of Plaintiff's claims.

III. Trial

A. Have any of the parties demanded a jury trial?

Defendant has demanded a jury trial on all issues so triable pursuant to Federal Rule of Civil Procedure 38(b).

B. What is the trial date (if any)? If there is no trial date, when will the parties be ready for trial?

No trial date has been set. The parties anticipate being ready for trial by February 24, 2026.

C. Have the parties filed a final pretrial order? If so, when? If not, when is the deadline for the filing?

The parties have not filed a final pretrial order. The final joint pretrial submission is due to the Court by January 16, 2026.

D. Estimate the number of trial days.

The parties estimate 4–6 trial days.

IV. Settlement, Referrals, and Consent

A. Have any settlement discussions taken place? If so, what is the status?

No settlement discussions have taken place.

B. Has this case been referred to the Magistrate Judge for discovery supervision and/or a settlement conference?

This case has not been referred to a Magistrate Judge for discovery supervision and/or a settlement conference.

C. Do the parties request a settlement conference at this time before this Court or the Magistrate Judge?

The parties do not request a settlement conference at this time.

D. Have counsel informed their respective clients about the possibility of proceeding before the assigned Magistrate Judge for all purposes, including trial and entry of final judgment? Do all parties unanimously consent to that procedure?

The parties have been informed about the possibility of proceeding before the assigned Magistrate Judge for all purposes. The parties do not unanimously consent to proceed before the assigned Magistrate Judge, but should Plaintiff retain counsel then counsel for Defendant will confer with counsel for Plaintiff.

V. Other

A. Is there anything else that the plaintiff(s) wants the Court to know?

Plaintiff requests additional time to locate counsel to represent her in this matter.

B. Is there anything else that the defendant(s) wants the Court to know?

Not at this time.

Dated: September 5, 2024

Respectfully submitted,

By: /s/ Jemima Sanchez
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Pro se Plaintiff

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